

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Brad R. Bender : CHAPTER 13
: Case No: 13-20074-REF
: Debtor, : ORIGINAL PLAN ☐
: AMENDED PLAN XXX

DEBTOR'S FOURTH AMENDED CHAPTER 13 PLAN

YOUR RIGHTS WILL BE AFFECTED

READ THIS PLAN CAREFULLY. If you oppose any provision of this Plan you must file a timely written objection. This Plan may be confirmed and become binding on you without further notice of hearing unless a written objection is filed before the deadline stated on the Notice issued in connection with the filing of the Plan.

1. DISCHARGE:

XXX The Debtor will seek a discharge of debts pursuant to Section 1328(a).

☐ The Debtor is not eligible for a discharge of debts because the Debtor has previously received a discharge described in Section 1328(f).

2. PLAN FUNDING AND LENGTH OF PLAN:

A. The future earnings of the debtors are submitted to the supervision and control of the Trustee and the Debtor, **BRAD R. BENDER**, shall pay to the Trustee the total sum of \$81,351.92, of which the sum of \$26,656.00 has been paid during the 1st through 31st months of the Plan, and the balance of \$54,695.92, shall be paid as follows:

Start/End Date	Plan Payment	Total Payment
7/16 through 10/18	\$1,886.07	\$52,809.96
11/18	\$1,885.96	\$ 1,885.96

The Plan's applicable commitment period is five (5) years.

C. The Debtor is responsible for funding the Plan.

3. PRIORITY CLAIMS

A. Allowed unsecured claims entitled to priority under Section 507 will be paid in full with the exception of certain assigned Domestic Support Obligations that may be paid less than 100% pursuant to Section 1322(a)(4):

Name of Creditor	Total Payment	Claim No.
None.		

B. Administrative Claims:

- (1) Trustee fees. Percentage fees payable to Frederick L. Reigle, Standing Chapter 13 Trustee, will be paid at the rate fixed by the United States Trustee, not to exceed 10%.
- (2) Attorney Fees. In addition to the fees paid by the Debtor prior to confirmation, the sum of \$750.00 will be paid for post-confirmation attorney's fees through Debtor's First Amended Plan Post-Confirmation.

4. SECURED CLAIMS

- A. Mortgages and Other Direct Payments by Debtor. Payments will be made outside the Plan according to the original contract terms, with no modification of contract terms and with liens retained.

Name of Creditor	Collateral	Monthly Payment	Claim Amount
Ocwen Loan Servicing (Fannie Mae)	7201 McKee Court Macungie, PA	Per contract	\$269,554.57
Green Tree Servicing	7201 McKee Court Macungie, PA	Per contract	\$ 68,135.23

- B. TOTAL BALANCE OF SECURED CLAIM including the Applicable interest, late fees and costs as follows:

Name of Creditor	Collateral	Amount to be Paid through Plan	Claim No.
Wells Fargo Financial NB NA	Furniture	\$1,984.72 of which \$1,984.72 has been paid to date.	4

- c. ARREARS on Secured Claims as follows:

Name of Creditor	Collateral	Amount to be Paid through Plan	Claim No.
Owen Loan Servicing	7201 McKee Court Macungie, PA	\$3,018.73 pre-petition arrearage of which \$3,018.73 has been paid to date & \$24,721.22, post-petition arrearage	#7
Green Tree Servicing	7201 McKee Court Macungie, PA	\$609.58 pre-petition arrear of which \$609.58 has been paid to date.	#3

5. UNSECURED CLAIMS:

After all secured and priority claims have been paid, all allowed unsecured claims shall receive 100% of their claim.

6. EXECUTORY CONTRACT AND UNEXPIRED LEASES:

The following executory contracts of the Debtors are rejected:

Creditor/Lessor	Property Description	Assume/Reject
AT&T	Cell phone	Assume
LA Fitness	Gym membership	Reject
Massage Envy	Massage	Reject

7. REVESTING OF PROPERTY:

Title to the Debtor's property shall revert in the Debtor on confirmation of Plan.

8. LIEN AVOIDANCE:

Debtor exercises his right to avoid all liens as allowed by law under 11 U.S.C. Section 522(f).

Dated: 6/30/16 /s/ Brad R. Bender
Brad R. Bender

Dated: 6/30/16 /s/ John R. K. Solt, Esquire
John R. K. Solt, Esquire
Attorney for Debtor

Acceptances may be mailed to:
John R. K. Solt, Esquire
John R. K. Solt, P.C.
2045 Westgate Dr., Suite 404B
Bethlehem, PA 18017

PAYMENTS TO THE STANDING CHAPTER 13 TRUSTEE
SHOULD BE MADE PAYABLE AND MAILED AS FOLLOWS:

Frederick L. Reigle, Trustee
P.O. Box 680
Memphis, TN 38101-0680

EXHIBIT "B"

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: BRAD R. BENDER : CHAPTER 13
: Debtor, : Case. No. 13-20074-ref

**ADDENDUM TO EXHIBIT "B" TO DEBTOR'S MOTION TO
MODIFY HIS CHAPTER 13 PLAN POST-CONFIRMATION
AND FOURTH AMENDED CHAPTER 13 PLAN**

Debtor's Fourth Amended Chapter 13 Plan filed on June 30, 2016 as Exhibit B to Debtor's Motion to Modify His Chapter 13 Plan Post-Confirmation, is amended in the following respect:

2. PLAN FUNDING AND LENGTH OF PLAN:

- A. The future earnings of the debtor is submitted to the supervision and control of the Trustee and the Debtor, **BRAD R. BENDER**, shall pay to the Trustee the total sum of \$81,716.67, of which the sum of \$26,656.00 has been paid during the 1st through 31st months of the Plan, and the balance of \$55,060.67, shall be paid as follows:

Start/End Date	Plan Payment	Total Payment
7/16 through 10/18	\$1,898.64	\$53,161.92
11/18	\$1,898.75	\$ 1,898.75

In all other respects, Debtor's proposed Fourth Amended Chapter 13 Plan Post-Confirmation remains the same.

Dated: 8/4/16

/s/ Brad R. Bender
Brad R. Bender

Dated: 8/4/16

/s/ John R. K. Solt, Esquire
John R. K. Solt, Esquire